

May 19, 2016

VIA ECF

Hon. Paul A. Engelmayer, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, New York 10007

Re: Wilson, et al. v. Perrell, et al.
Case No. 16-104 (PAE)

Dear Judge Engelmayer:

This firm represents Defendant Broadcast Music, Inc. (“BMI”) in the above-referenced matter. We write to respectfully request a 30-day extension of time for BMI to respond to Plaintiffs’ Complaint in order to pursue discussions with Plaintiffs’ counsel about a potential amicable resolution of this matter as to BMI. Plaintiffs’ counsel has consented to this request.

BMI’s current deadline to respond to Plaintiffs’ Complaint is May 23, 2016. With the extension requested herein, BMI’s new response deadline would be June 22, 2016. This is BMI’s second request for an extension. BMI’s first request for an extension from April 21, 2016, to May 23, 2016 was granted. *See* ECF No. 28.

We thank the Court for consideration of this request and remain available at the Court’s convenience to address any questions or concerns.

Respectfully submitted,

s/ J. Brugh Lower
J. Brugh Lower

cc: All counsel of record (via ECF)